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HEARING DATE : June 14, 2012  
9:45 am (Eastern Time)

OBJECTION DEADLINE: June 7, , 2012  
4:00 pm (Eastern Time)

- and -

Paul A. Rachmuth (pr1566)  
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*Class Counsel in General Motors Case,  
Anderson v. General Motors*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

**MOTORS LIQUIDATION COMPANY, *et al.*,  
f/k/a General Motors Corp., *et al.***

Debtors.

Chapter 11

Case No. 09-50026 (REG)

(Jointly Administered)

**NOTICE OF ANDERSON CLASS COUNSEL'S MOTION FOR  
APPROVAL OF NOTICE PURSUANT TO FED. R. CIV. P. 23(h) FOR  
AWARD OF ATTORNEY'S FEES FROM CLAIM No. 51093  
SETTLEMENT FUND**

PLEASE TAKE NOTICE that upon the annexed motion, dated May 14, 2012 (the "Motion"), of *Anderson* Class Counsel Girard Gibbs LLP ("Class Counsel") for an order, pursuant to Bankruptcy Rules 7023 and 9019 and Rule 23(h) of the Federal Rules of Civil Procedure, approving the form, content and manner of notice to the *Anderson* class members who submitted valid claims of an application for an award of attorney's fees to be paid out of the Claim No. 51093 settlement fund, upon the supporting Declaration of A. J. De Bartolomeo,

sworn to on May 14, 2012 and upon the memorandum of law dated May 14, 2012, a hearing will be held before the Honorable Robert E. Gerber, United States Bankruptcy Judge, in Room 621 of the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, New York 10004, on **June 14, 2012 at 9:45 a.m.** (Eastern Time), or as soon thereafter as counsel may be heard.

PLEASE TAKE FURTHER NOTICE that Class Counsel have conferred with attorneys for Motors Liquidation Company (f/k/a General Motors Corporation) and its affiliated debtors, as debtors and post-effective date debtors (the “Debtors”) and are authorized to represent that the Debtors agreed that they would take no position on the application for attorneys’ fees from the approved claim No. 51093 settlement fund.

PLEASE TAKE FURTHER NOTICE that any responses or objections to the Motion must be in writing, shall conform to the Federal Rules of Bankruptcy Procedure and the Local Rules of the Bankruptcy Court, and shall be filed with the Bankruptcy Court (a) electronically in accordance with General Order M-399 (which can be found at [www.nysb.uscourts.gov](http://www.nysb.uscourts.gov)) by registered users of the Bankruptcy Court’s filing system, and (b) by all other parties in interest, on a CD-ROM or 3.5 inch disk, in text-searchable portable document format (PDF) (with a hard copy delivered directly to Chambers), in accordance with the customary practices of the Bankruptcy Court and General Order M-399, to the extent applicable, and served in accordance with General Order M-399 and the Case Management Order entered in this bankruptcy case on May 5, 2011 [Docket No. 10183] (as may be amended) and on Girard Gibbs LLP, Class Counsel and attorneys for class action plaintiff Jason Anderson and all others similarly situated, 601 California Street, Suite 1400, San Francisco, California 94108 (Attn: Eric H. Gibbs, Esq. and A.

J. De Bartolomeo, Esq.), so as to be received no later than **June 7, 2012 at 4:00 p.m.** (Eastern Time) (the “Objection Deadline”).

PLEASE TAKE FURTHER NOTICE that if no objections are timely filed and served with respect to the Motion, Class Counsel may, on or after the Objection Deadline, submit to the Bankruptcy Court an order substantially in the form of the proposed order annexed to the Motion as Exhibit A, which may be entered with no further notice or opportunity to be heard offered to any party.

Date: May 14, 2012

**GIRARD GIBBS LLP**

By: /s/ A.J. De Bartolomeo  
A. J. De Bartolomeo

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